

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:23-cv-21378-RAR

CRAIG BUREY,

Plaintiff,

v.

NOMI HEALTH, INC., SBP STAFFING
AND RECRUITING LLC, SB PORT
VENTURES LLC and TRIXIE BELO-
OSAGIE,

Defendants.

**DEFENDANTS SBP STAFFING AND RECRUITING LLC AND SB PORT VENTURES
LLC'S *UNOPPOSED* MOTION FOR A ONE-WEEK EXTENSION
OF TIME TO FILE A RESPONSE TO PLAINTIFF'S COMPLAINT**

Pursuant to S.D. Local Rule 7.1(a) and Fed. R. Civ. P. 6(b), Defendants, SBP Staffing and Recruiting LLC ("Defendant SBP") and SB Port Ventures LLC ("Defendant SB Port"), by and through their undersigned counsel, respectfully move the Court for an extension of time to file their responses to Plaintiff's Complaint for FLSA Overtime Wage Violation(s). [ECF No. 1]. As grounds, the Defendants state:

1. On April 12, 2023, Plaintiff filed his Complaint. [ECF No. 1].
2. On May 2, 2023, Defendants SBP and SB Port were served with the Complaint.

Accordingly, Defendants' response is currently due on May 23, 2023.

3. Counsel for the Defendants SBP and SB Port was recently retained on this matter, and seeks an extension of time to review Plaintiff's Complaint, evaluate Plaintiff's claims, and adequately prepare Defendants SBP and SB Port's responses to the same.

4. Fed. R. Civ. P. 6(b) vests the Court with discretion to enlarge deadlines for good cause. Here, Defendants SBP and SB Port respectfully submit that an extension to file their responses to Plaintiff's Complaint would serve the interests of justice.

5. This Motion is made in good faith and not for the purpose of delay. Plaintiff will not be prejudiced by the requested extension. Further, this Motion is unopposed.

Accordingly, Defendants SBP and SB Port respectfully move the Court for a one (1) week extension of time up to, and including, May 30, 2023, to file their responses to Plaintiff's Complaint.

DEFENDANT'S LOCAL RULE 7.1(a)(3) CERTIFICATION

Pursuant to Local Rule 7.1(a)(3), undersigned counsel for Defendants SBP and SB Port certifies that he conferred with counsel for Plaintiff regarding the relief sought in this Motion, and counsel for Plaintiff has indicated that he does not oppose the relief sought herein.

Respectfully submitted this 23rd day of May, 2023.

Respectfully submitted,

GRAYROBINSON, P.A.

/s/ Fabian A. Ruiz

Marlene Quintana, B.C.S.

Florida Bar No. 88358

marlene.quintana@gray-robinson.com

Fabian A. Ruiz

Florida Bar No. 117928

fabian.ruiz@gray-robinson.com

333 S.E. 2nd Avenue, Suite 3200

Miami, Florida 33131

Telephone: (305) 416-6880

Facsimile: (305) 416-6887

*Counsel for Defendants SBP Staffing and
Recruiting LLC and SB Port Ventures LLC*

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties either via transmission of Notice of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: /s/ Fabian A. Ruiz
*Counsel for Defendants SBP Staffing and
Recruiting LLC and SB Port Ventures LLC*